October 29, 2003

Commissioners:

I am an amateur radio operator with an extra class license which I have held nearly twenty years, and I have been licensed thirty. I have a B.S. in electrical engineering and had been chief engineer for a couple AM radio stations. On my wall are various amateur radio awards including QRP (no more than 10 watts input or 5 watts output) CW (Morse code) WAS (Worked All States), and QRP CW WAC (Worked All Continents). I have built and operated several low power cw transceivers, and I operate almost exclusively cw, with some ssb operation on ten and six meters, and a little RTTY.

I am mostly in favor of The FISTS CW Club PETITION FOR RULE MAKING, RM-10811. I do not want to have deleted the requirement to pass Element 1 to obtain Technician plus Element 1 (ie, "Tech Plus") HF privileges, but otherwise am I in favor of it, and I am impressed with their thoroughness and thought given to ease of implementation.

I cannot summarize their points any better than they have put them, but I will add some general comments.

Introduction

1. Morse code (CW) is the second-most popular mode of operation in the Amateur Radio Service. ...

2. Its strengths are well known; ...

There is a lot to be said for a second-most popular mode with well known strengths. Take the following chart:

LEISURE TIME[1]

Television and radio are the top media choices for college students.

Percentage of College Students Who:	0	25	50	75	100
Watch TV in a typical week					94%
Listen to radio in a typical week					90%
Read a magazine occasionally					82%
Have watched cable or satellite TV most often					79%
Read 1 of the last 5 issues of the campus paper					72%
Read 3 of the last 5 issues					42%
Read national newspaper weekly					40%
Watched campus TV in the past month					36%
Read national online weekly					23%
Listen to campus radio station in the past week					13%

Ah, radio and TV. Both very popular but TV leads. What could be the attraction that radio retains? Plenty!

> The first fact which everybody knows is that radio is a mechanism which carries to an audience sounds and nothing but sounds. A radio play consists of words and word equivalents and nothing else. There is no visible actor disguised to assume a part. There is no stage-set contrived to resemble a place. There is only the

[1]Source: *Student Monitor*, Fall 2002, reprinted in *Young Money*, Aug/Sept 2003, p. 23.

> spoken word — an implement which poets have always claimed to use with special authority. There is only the word-excited imagination — a theater in which poets have always claimed peculiar rights to play. Nothing exists save as the word creates it. The word dresses the stage. The word brings on the actors. The word supplies their look, their clothes, their gestures. The more packed and allusive the word, the more illuminating its rhythms, the more perfectly is the scene prepared, the more convincingly is the play enacted. On the stage, verse is often an obstacle because the artifice of the verse and the physical reality of the scene do not harmonize: it is for this reason that verse is easily accepted on the stage only where the scene is made remote in time and therefore artificial to begin with, or where the verse is blurred out and made to sound as much as possible like prose. But over the radio verse is not an obstacle. Over the radio verse has no visual presence to compete with. Only the ear is engaged and the ear is already half poet. It believes at once: creates and believes. It is the eye which is the realist. It is the eye which must fit everything together, must see everything before and behind. It is the eye and not the ear which refuses to believe in the lovely girlhood of the middle-aged soprano who sings Isolde, or the delicate, water-troubling slenderness of the three fat Rhine maidens ridiculously paddling at the ends of three steel ropes. With the eye closed or staring at nothing, verse has every power over the ear. The ear accepts, accepts and believes, accepts and creates. The ear is the poet's perfect audience, his only true audience. And it is radio and only radio which can give him public access to that perfect friend. — ARCHIBALD MACLEISH, *The Fall of the City*, Preface[2]

That analysis was perfectly obvious for the time when it was written. Now we have TV with elaborate special effects. Some people watch TV to the exclusion of radio, and at any rate it is more popular. Does that mean our society has decided to dispense with literacy, knowledge of English, verbal skills both written and spoken? No way! We still teach our children to be literate, and we want them to progress beyond the Dick and Jane "See spot run" level.

The Basics of Writing

6. An ever-increasing familiarity with different textual forms.[3]

Sustained engagement with written text does something to the way that one thinks and solves problems. *Regular and sustained use of writing leads to high degrees of control over language, as does familiarity with a wide range of textual forms. Increased language*

[2]As quoted in Porter G. Perrin, Writer's Guide and Index to English (Chicago: Scott, Foresman and Co., 1942) p. 152.

[3]Brian Cambourne, The Whole Story *Natural Learning and the Acquisition of Literacy in the Classroom* (Auckland: Ashton Scholastic, 1988) p. 201.

control leads to intellectual, social and economic empowerment. Our society values and rewards those who have this power.

Of course, not everybody thinks this way. The empowering coming through the control of language and thinking which writing makes possible is threatening to some levels of society. The writer who knows how to use writing to develop his mind and clarify his thinking is a potentially dangerous individual — especially if he decides to write out his thoughts and theories in order to influence other people or perhaps change the status quo. Many of the political and social revolutions which have occurred throughout recent history have been influenced by writers who not only know **how** to use writing, but went ahead and used it. The old aphorism about the pen being mightier than the sword is an extension of this notion of empowerment through control of linguistic forms. Perhaps this lies at the root of some conservative views about how writing should be taught?

I quite agree with FISTS on the efficacy of the code for amateur applications. I quite agree that mandating an increased proficiency in the code for higher license(s) is most beneficial to the amateur community and the public we serve, just as increased literary proficiency benefits society as a whole. But I am under no illusions; I do not have to read all the comments you will get to figure a lot of them will be in favor of the status quo. A segment of society feels threatened by the very literate among us, and there is no reason to suppose a contingent of hams will not feel threatened by the FCC mandating increased Morse capability in order to upgrade.

It goes with the territory. Proficient CW operators can do many of the things SSB operators do every bit as well, a lot of things better, and some things much better. So if you get a number of replies to RM-10811 criticizing it without faulting the CW mode itself, look at our society around you and see how excellence is taken.

Back to 2.

"Morse code is often the only usable mode during periods of unfavorable propagation and high noise levels. Then, Morse code replaces Single Sideband (SSB) voice in transferring messages in and out of disaster areas, but only if amateurs still know Morse code."

Ability to provide emergency communications is a mainstay of the amateur radio service. We might want to consider what part a mastery of Morse code might provide in an emergency. Let us see how other emergencies are handled, without involving radio, just to get a feel for the subject.

> ... Madame's shriek ... launched him on a mad scramble around the house.
>
> Another scream! Fabrice clutched his machete as he ran; if anyone was harming Madame — !
>
> She was floundering at the far end of the pool, out where the water was more than three meters deep. Without breaking stride, Fabrice dropped the machete, hurled himself into the pool, and began swimming, frantically begging

Agwe, l'wah of the seas, to please please please spare Madame's life.

As Fabrice drew near, he realized that he did not know the proper way to save her. Trusting the spirits to guide him, he dove down and, ignoring the burning in his eyes, grasped her thrashing legs and hugged them to his chest. Then, planting his feet on the concrete bottom, he hoisted her torso high into the life-giving air and held it there.

Her kicking subsided. Fabrice, still submerged and still clutching her legs, lurched to the pool's side and held her aloft until her weight shifted and he knew she was safely out. Only then did he push off the bottom, burst from the water, and gulp in huge mouthfuls of air.

He dragged himself halfway out of the pool, rested his cheek on his folded arms, and listened to the galloping of his heart.[4]

Okay, that's one way to do it. Let's see how that compares with American Red Cross recommendations.

WATER RESCUE[5]

Most drownings occur within reach of safety; thus, rescue is often possible even if the first-aider is unable to swim. If a swimmer is in trouble near a dock or the side of a pool, lie down and extend your hand or foot to him, or hold out a towel, shirt, stick, fishing pole, float, deck chair, tree branch, or other object at hand and pull him to safety. Use a line or ring buoy, if possible. If the swimmer is too far from shore for these measures, wade into waist-deep water first with a suitable object to extend to him, push out a board to which he can cling while you go for help, or grasp his wrist and pull him to safety.

If a boat is available, row out to the victim and let him grasp the stern, or extend an oar and draw him around to the stern where he can hang on while you row to shore. If he is unable to hold onto the stern or oar, pull him to the boat and, after checking for injuries, pull him into the boat.

If you are not trained in lifesaving, *do not* attempt a swimming rescue. Additional information can be found in the American National Red Cross textbook *Lifesaving and Water Safety*, which also includes a section on ice-accident prevention and rescue.

Just as "most drownings occur within reach of safety," let us say for sake of argument that a good many emergencies hams are called on to handle would be manageable within reach of their favorite voice or digital mode. The problem facing Fabrice was that even though Madame was within his reach had he lied on the edge of the pool and extended the machete in his hand, the business end of the tool was not compatible with Madame's soft hand.

Not all of the modes we hams use although able to reach to the ham on the other end are necessarily compatible with the mode

[4]Steven D. Salinger, White Darkness (New York: Crown Publishers, 2001) pp. 17f.

[5]Advanced First Aid and Emergency Care (Washington, D.C., American Red Cross, 2nd ed., 1979) pp. 91-2.

his receiver is in at the time of an emergency. When I am operating RTTY, my computer is not deciphering other digital modes I tune across; in fact it is not even deciphering other RTTY signals unless I have them tuned in exactly. When I tune my AM aircraft receiver across the 2 meter ham band, I can copy amateur FM signals by slope detection when I pass over them, but an FM receiver does not do well copying AM, and an AM receiver does a poor job on SSB.

The very proliferation of modes works against our effectiveness in an emergency so that we might be forced, as Fabrice was, to rely on divine intervention and a landline. CW has the advantage that it is easily copied as long as one has a beat frequency oscillator, and somewhat copyable without one. In fact part of the rationale for the international **SOS** distress signal, three dots followed by three *elongated* dashes followed by another three dots, is that it ominously stands out amid the clutter of the airwaves.

The Red Cross advises one not to attempt a swimming rescue unless he has been trained for it. They refer to a separate book for the training. One would need to learn the hold to use, the stroke to employ, and the means to avoid having a panicky victim grab hold of the rescuer drowning them both. Likewise, emergency communications that are too far out, where only CW communication is effective, require that the hams involved have actually learned the code *and know it well enough to use it effectively in an emergency.*

I remember my Novice days struggling up from 5 wpm. It was all I could do to copy the basics: signal report, name, QTH. I laboriously printed on paper everything I copied, and after I signed off with the other station I would go over the gobbledygook to see if I could decipher anything else. Well, one night I returned to my notes after dinner to find I had copied in there: "I want to get a message into Pittsburgh," from a station in Detroit. I lived in Pittsburgh, but he was long gone by the time I pulled out the text. (That was the reason for all the repeats instead of clearing with me.)

Several years later I used to check into traffic nets. I had an ad in the company paper offering to send free radiograms of twenty words or less to anywhere in the U.S., U.S. possessions, and Canada. One evening a woman called me up whose father had just died and she wanted to let her brother know, who lived in an isolated village without telephones in Alaska, that the funeral would be in a couple days. I took down her message.

But all the traffic nets had finished by then except for the slow speed net in the Novice band; it took longer to finish. I listed my priority traffic which somehow was not receiving preferential treatment as the net control station went laboriously about his business. Finally a more experienced operator told him he would take my traffic which he did at a higher speed off frequency.

My point is that five words per minute is like barely knowing how to swim, not the level one needs to perform a swimming rescue.

A ham would want to have proficiency at a higher speed—12 wpm

minimum—to be able to perform well in an emergency where he has to deal with other matters, the emergency communication itself, and whatever else is coming across the band.

Back to the FISTS petition:

> 12. ... Failure to keep Morse testing part of the licensing structure undermines many core activities integral to the Amateur Radio Service and nullifies one of the , i.e., to train a " . . . reserve pool of qualified radio operators and technicians."

That is actually more than simply a "*traditional* objective of the Service," but is one of the basis and purposes[6] of the Amateur Radio Service.

I once worked as an assistant motorman on a ship in the Pacific, and I would hang out in the radio room when off duty. One day the commercial radio operator was having difficulty keeping up with the Morse code message he was getting, so he asked for my help. I copied it handily while he was looking over my shoulder. I suppose I was fulfilling a role of "reserve qualified radio operator" inasmuch as I could copy the message for him although he had to sign off on it.

I am thinking that although CW is not used for ship communication much any more, and the armed services don't use it much either—special ops and astronauts are still required to know it—, it is still being used by someone. I can tune across the shortwave bands and hear plenty of Morse code outside the amateur bands. But nowhere except in the amateur bands, and there it used to be only the in Novice bands, will I hear it sent at speeds as slow as five words per minute (5 wpm).

If we amateurs are to be a reserve pool "of trained operators," how can we fulfill that role if to enter that pool we need only be able to send and receive at 5 wpm? I mean, that commercial operator having difficulty copying the code at 15 wpm is not going to turn to a guy for help who can only do 5.

A Licensing Path to Encourage Children to Enter Amateur Radio

13. Young people are not "turned off" by learning the Morse code.[7, 8] In fact,

[6] 97.1. Basis and purpose. The rules and regulations in this part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

> (d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

[7] See Mr. Michael Dinelli's (N9BOR) experiences in his ARRL Web article, Don't Embarrass me Dad! Featured article at http://www.arrl.org, Web site of the American Radio Relay League (ARRL), Sept. 13, 2000.

[8] When the ARRL polled its members in 1996, the youngest group of respondents (under age 24) were most in favor of the Morse code exam with 85% for, and only 15% against.

children are attracted to it much as they are to other "secret languages" and puzzles. Young people learn languages and codes with facility and become quite proficient. Children young as 6-years of age have earned Technician Class, General Class[9] and even Extra Class licenses.

Besides the article footnoted above, which I include separately with this submission, I point out that children responding positively to (language) challenges is well established.

UPBRINGING[10]

By judiciously encouraging the child, educators can help many capacities to unfold — capacities which most people still think can be developed only in unusually talented children.

COGNITIVE DEVELOPMENT[11]

Adolescents are challenged by more difficult subjects in school (e.g., algebra, biology, chemistry) ...

For a representative story of such a response by a young person to challenge, let us look at a respected black author — finalist for the 1991 *Los Angeles Times* Book Award; selected as one of the Best Books of 1991 by *Publishers Weekly*; the recipient of a Guggenheim Fellowship and a Whiting Writer's Award; regional finalist in Granta's Best Young American Novelist award competition — who uses a lullaby to instruct us in a novel.

Not long after I started working, an event occurred at the Earls' home that would change me forever. Mr. and Mrs. Earl were going out for the evening. I remember that the occasion was formal. Mr. Earl, a handsome, dark-haired man with blue eyes, was wearing a tuxedo. Mrs. Earl, blond, much shorter than her husband, but with an elegance that made her seem taller than she really was, wore a simple black gown, and even though the October evening, as I recall it, was pretty warm, she carried a light shaw. They had two children: Martin, who was six years old, very bright and fairly self-sufficient; and Daniel, who was two years old and

[9]One of many examples: *Six-Year-Old Oregon Girl Gets General Ticket*, Nashoba Valley Amateur Radio Club (NVARC) Newsletter, Volume 12, No. 2 (February 2003). Pepperell, Mass. Six-year-old Mattie described the Element 1 Morse exam as, "not too hard, just a little, but kind of easy too."

[10]Rudolph R. Dreikurs, M.D., Fundamentals of Adlerian Psychology (Chicago: Alfred Adler Institute, 1953) p. 81.

[11]Henry Roediger et al, Psychology 2nd. Ed. (Boston: Little, Brown & Co., 1987) p. 364.

adorable. I was in the habit of rocking him to sleep, and he liked it so much that sometimes all he wanted to do was pretend that it was bedtime. We cuddled a lot.

On this particular evening, Daniel and I (Martin was in his bedroom) said our good-byes to Mr. and Mrs. Earl at the back door that led to the garage, and then we went into the living room to play.

"Rock me, A," Daniel said, unable to pronounce my name completely. And he jumped into my arms before I could even sit down on the sofa. I tickled him a little, and he laughed. I held him close and sang the lullaby I always sang to him. It was the one I knew best, the one my French Creole grandmother — "Mommie," with the accent on the second syllable, we had called this woman, my mother's mother, who, sadly, died a week after her husband, Poppie — had sung to all of her grandchildren:

> Do, do, do, bébé ...
> Do, do, sweetie pie ...

Okay. It was kind of plain, but it was not without its magic. Daniel seemed to love it as least as much as my cousins, my brother, and I had. I sang more and tickled him more. In response to his laughter, which was like a series of little coughs, I snuck in a few tickles, asking rhetorically, "What's wrong? Eh?" I assumed my grandmother's Frenchiness. "What's wrong, bébé? "What's wrong, ti nègre?"

Mrs. Earl, though I hadn't noticed her entrance, must have come in a few moments before to pick up her forgotten purse, and now she made her presence known with a gentle but definitive gasp. In retrospect, I like to think that her reaction had less to do with what I had said than with her mere surprise that I had said it, that her breathlessness was to some extent due to her own laughter at the comical affection that Daniel and I were exchanging before she pointed out my minor, though ultimately enlightening, malapropism.

"What did you call him?" she asked. Never more quizzical had I seen her face appear.

"What?" I asked, sincerely not knowing to which part of my baby talk she was referring.

"The last," she said.

"Bébé?" I asked, befuddled, starting to think that the woman was simply resenting my closeness to her son, who, at hearing me say "bébé," began to sing, "Do, do, do, bébé ..."

"No!" she said to me. Then she whispered, "The other," as if she meant that I'd said something dirty.

I searched my mind and finally found the phrase, not the written words, for I had never seen them in writing, but the sounds, spoken in my mind in some harmonic blend of Mommie's voice and my own. I had a momentary inkling that my pronunciation (and my grandmother's) of the word had been incorrect; maybe that was part of Mrs. Earl's displeasure. Still, I was so happy to have discovered "the other," as she had called it, that I just yelled it: "Ti nègre!"

"Yes," Mrs. Earl whispered. "Don't call him that."

"I'm sorry. Why not?"

"Because ..."

"Why?" I said sadly, with a sense of foreboding. "Why? What does it mean?" I asked, for I truly did not know. It was just a sound, a pleasant one, a foreign one, I knew, but one made familiar and good to my ears and to Daniel's as well, through its obvious function as a term of endearment. How could she not want me to call her son something this good? Her mouth agape, as if prepared to respond, she was, nevertheless, slow to answer, so I asked again, "What does it mean?"

"My god, you don't know." Then she whispered, "Little nigger." She added firmly, but with something of a smile, "Don't call him that. I forgot my purse."

The next morning, thoroughly embarrassed by my nescience but strangely stimulated by a feeling akin to suspense, I rushed to the library. I was so confused by what Mrs. Earl had said to me that I had to check to be sure that, among other things, "bébé" actually meant "baby." It did. It turned out that the "do" of "do, do, do, bébé" was short for "dormir," the French verb for "to sleep." "Ti" was short for "petit" or "petite," and indeed did mean little. The meaning of "nègre," on the other hand, was not as simple as "nigger," or maybe I should say that it was just as complex, albeit for different reasons. "Nègre," whose kinship to me (and distance from Daniel) became apparent upon my first sighting of it, was not just "nigger," but "black" or just "dark." "Nègre" was, of course, kin to "noir," that is "black," and sometimes the two were interchangeable. It was sometimes even "brown" or, in French, "brun" or "marron." Interestingly enough, the term "petit nègre," according to one dictionary, in a definition that dated back at least to 1899, sometimes actually meant "incorrect French as spoken by the people indigenous to the colonies of France." I wondered what my grandmother, who spoke nothing if not a language that was itself, by this definition, petit nègre, meant to say when she called me "ti nègre." Was it "little nigger"? Was it "little black"? Whatever it was literally, it was also "sweetie pie," "honeybun," and "huggy-bear." I was convinced that Mrs. Earl had overdramatized the issue, because whatever her son was or was not, he was definitely dear, "cher," I had discovered that morning, a word I knew as "che'" from hearing it as a child.[12]

The baby sitter's blunder was:

nigger, applied to others than full or partial negroes, is felt as an insult by the person described, & betrays in the speaker, if not deliberate insolence, at least a very arrogant inhumanity.[13]

And yet, if used as a genuine term of endearment the *worst* we can call it—when a White is called a nigger—is a malapropism, and the black author tells us not to go overboard in correcting it. He uses the perceptions of youth to moderate our politically

[12]Louis Edwards, N: *A Romantic Mystery* (New York: Dutton - Penguin Books, 1997) pp. 5-8.

[13]Fowler

correct extremes, a youth who had enough credible interest in language to pursue the matter in depth rather than just accept the instruction he was given. Similarly, I believe youth given the requirement of learning code at moderate speeds will rise to the challenge.

I was just a kid when I memorized the code table. I would listen to code on an old shortwave receiver and decipher letters here and there. One day I got a whole word: "CHOWCALL," and then the station left the air. I was beaming, I had accomplished getting a message.

At Christmas I was given an electronic experimenters kit, and I constructed the Part 15 Broadcast Band CW transmitter. Out in the country there was only one other kid in range, and he wasn't interested in pursuing it, so I put it on the shelf.

I was too young to be permitted to stay up to ring in the new year, so I tuned in my favorite station on my crystal radio set and settled in bed with the earphones on to await the new year. Next thing I knew, I was awakened by Morse code in my earphones. I jumped out of bed and went over to my own set. There was another kid with a set transmitting, so I sent out my name and came back to my receiver only to hear the end of the code and then a deep voice announce, "This is KDKA signing off for the night." I had tried to work a big AM station. I sure had a good laugh over that.

My point is that kids will rise to the challenge of being good for Santa to bring them gifts, and then they will find some way to stay awake for new year's too. I believe that a kid who is motivated enough to learn the theory for an advanced license will find some way to master the code also. Using kids to set the example for adults to master the code is a nice touch on the FISTS petition, I think.

There are many other good and valid points that FISTS makes; I have chosen to comment on a few and endorse the rest, save for the proviso of keeping Tech-plus as is.

Respectfully Submitted,
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